

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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CLAUDE V. LEWIS, : **Civil Action No. 1:14-cv-02302(CRK)(KNF)**  
:   
Plaintiff, : (ECF Case)  
:   
-against- :   
: **NOTICE OF MOTION TO BIFURCATE**  
AMERICAN SUGAR REFINING, INC, : **PURSUANT TO FED. R. CIV. P. 42(b)**  
and MEHANDRA RAMPHAL, :   
:   
Defendants. :  
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**PLEASE TAKE NOTICE** that the undersigned attorneys for Defendant American Sugar Refining, Inc. and Mehandra Ramphal (the “Defendants”) shall move before the Hon. Claire R. Kelly, U.S.D.J. sitting by designation in the United States District Court for the Southern District of New York in the U.S. Court of International Trade, One Federal Plaza, New York, New York 10278 for an Order granting the Defendants’ Motion to Bifurcate Punitive Damages from the Liability and Compensatory Damages Portion of the Trial pursuant to Fed. R. Civ. P. 42(b); and

**PLEASE TAKE FURTHER NOTICE** that the Defendants will rely upon the Memorandum of Law and Certification of Michael T. Hensley, Esq., with exhibits, submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that a proposed form of order is being submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that the Defendants request oral argument.

Dated: New York, New York  
March 22, 2018

By: /s/ Michael T. Hensley

Michael T. Hensley, Esq.

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